

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AU NEW HAVEN, LLC, and	:	Civil Action No.
TRELLEBORG COATED SYSTEMS US, INC.,	:	15-CV-03411-GHW
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
YKK CORPORATION,	:	
	:	
Defendant.	:	January 13, 2016

JOINT REQUEST TO PLACE DKT. NO. 65-1 UNDER SEAL

Defendant has informed Plaintiffs that Defendant believes Plaintiffs' Proposed Amended Complaint attached as Exhibit A to Plaintiffs' Motion to Amend Complaint and Add Parties (Dkt. Nos. 65 and 65-1), which was filed publicly, discloses information that is designated by Defendant as "Confidential—AEO" under the Protective Order (Dkt. No. 29). Plaintiffs disagree and assert that the Proposed Amended Complaint does not contain any "Confidential-AEO" information of Defendant.

In view of this dispute, the parties have agreed to approach the Court to request that the Proposed Amended Complaint (Dkt. 65-1) be placed under seal until such time as the issue may be resolved. Placing the document under seal will prevent further dissemination of information Defendant considers highly sensitive while allowing time for the parties to approach the Court about this issue.

The parties thus request that Dkt. No. 65-1 be removed from the public docket and placed under seal until a resolution is reached.

By: /s/ Brian P. Daniels

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